## Lyons & Flood, llp

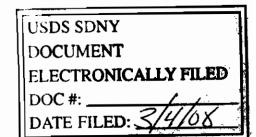
ATTORNEYS AT LAW

65 WEST 36TH STREET, 7TH FLOOR NEW YORK, NEW YORK 10018

## MEMO ENDORSED

KIRK M. LYONS E-Mail: klyons@lyons-flood.com

TELEPHONE: (212) 594-2400 FAX: (212) 594-4589



March 4, 2008

## BY TELEFAX

(212) 805-7949

Honorable P. Kevin Castel United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St., Room 2260 New York, NY 10007

Giorgos B Maritime Ltd. v. Reynolds Shipping (USA) LLC

07 Civ. 10387 (KPC) Our file: 2600026

Dear Judge Castel:

We are attorneys for plaintiff in this Rule B maritime attachment action and request a second adjournment of the pretrial conference which had originally been adjourned from Friday, January 4, 2008, at 11:00 a.m., until Friday, March 7, 2008, at 9:15 a.m., pursuant to Your Order dated December 27, 2007.

By way of background, plaintiff is a Greek corporation and was the owner of the M/T GIORGOS B (the "Vessel"). In July of 2005, the defendant, a Texas-based corporation, chartered the Vessel from plaintiff and subsequently failed to pay charter hire that was due and owing, failed to pay for other expenses incurred by plaintiff, and redelivered the Vessel early causing plaintiff to incur lost profits.

Plaintiff commenced London arbitration to recover damages totaling \$1,256,432.00, inclusive of interest and costs (recoverable in London arbitration), and brought this action to obtain pre-judgment security.

Plaintiff has been serving garnishee banks with the process of maritime attachment and garnishment since November 19, 2007, but has not yet obtained any security for its claims.

NEW JERSEY OFFICE:

1495 MORRIS AVIONOR UNION, NJ 07083

TRL: (201) 569-4435 FAX: (201) 569-4438

CONNECTICUT OFFICIE

19 COVENTRY LANK RIVERSIDE, CT 06878

TEL: (203) 661-2355 FAX: (203) 661-2577

Since defendant's property has not been attached, plaintiff has not notified defendant of this action under Rule B(2). Thus, to date, defendant has not appeared in this action.

In light of the fact that plaintiff continues to seek security from defendant, we respectfully suggest that there is no need for an initial pretrial conference at this time.

Unless and until defendant has appeared in the action, no discovery is necessary, particularly since the parties have agreed by the terms of their charter party to arbitrate the underlying claims in London, England.

Accordingly, we request the pretrial conference presently scheduled for March 7 at 9:15 a.m. be adjourned for another sixty (60) to ninety (90) days.

We thank you for your attention to this matter.

Respectfully yours,

Lyons & Flood, LLP

Kirk M. Lyons

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